

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

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STEPHANIE MERCIER,  
AUDRICIA BROOKS,  
DEBORAH PLAGEMAN,  
JENNIFER ALLRED,  
MICHELE GAVIN,  
STEPHEN DOYLE, on behalf of themselves  
and all others similarly situated,

Plaintiffs,  
v.

No. 12-920C  
(Judge Kaplan)

THE UNITED STATES OF AMERICA,  
Defendant.

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**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT AND APPROVAL OF NOTICES OF CLASS ACTION  
SETTLEMENT**

Plaintiffs move the Court for preliminary approval of the Settlement Agreement with the Defendant resolving claims of unpaid overtime and for approval of the proposed Notices of Class Action Settlement. Specifically, Plaintiffs request that the Court:

1. Preliminarily approve the Settlement Agreement as fair, reasonable and adequate, and in the best interest of the Class subject to the right of any Class Member to object to the fairness, reasonableness or adequacy of the Settlement Agreement and to show cause why a final judgment dismissing this case with prejudice should not be entered following a fairness hearing;
2. Approve the form and content of the Notice[s] of Class Action Settlement and manner of Notice;

3. Appoint Brown Greer, PLC as the Settlement Administrator to perform the duties set forth in the Settlement Agreement;
4. Direct the Settlement Administrator to mail the Notices of Class Action Settlement to Class Members within fifteen (15) days of the entry of the Court's Preliminary Approval Order and to establish a website dedicated to the settlement on which relevant documents will be displayed and on which Class Members may obtain relevant information;
5. Set a deadline by which Plaintiffs must file their Motion for Final Approval and Motion for Attorneys' Fees and Litigation Expenses and Case Contribution Awards of thirty (30) days following entry of the Court's Preliminary Approval Order;
6. Set a deadline by which objections to the Settlement Agreement and/or Plaintiffs' Motion for Attorneys' Fees, Litigation Expenses and Case Contribution Awards must be filed of forty-five (45) days following entry of the Court's Preliminary Approval Order and a deadline of ten (10) days thereafter for counsel to respond to any objections;
7. Schedule a Fairness Hearing for no later than sixty (60) days after the entry of the Preliminary Approval Order to:
  - (a) determine whether the Settlement should be finally approved as fair, reasonable and adequate, and in the best interest of the Class Members; (b) determine whether the Notices utilized constituted the best practicable notices, reasonably calculated to inform Class Members of the terms of the Settlement and their rights to object to the Settlement and/or to the request for attorneys' fees, litigation expenses and case contribution awards; (c) determine whether a final Judgment should be entered

dismissing all claims in this action with prejudice and releasing all claims asserted herein against Defendant in accordance with the Settlement Agreement; and (d) determine whether Plaintiffs' request for attorneys' fees, litigation expenses and case Action Settlement Agreement and Approval of Notices of Class Action Settlement filed contemporaneously herewith.

Respectfully Submitted,

/s/ Michael Hamilton

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I hereby certify that on July 12, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for all parties.

/s/ Michael Hamilton